

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

IN RE TRICOR DIRECT PURCHASER  
ANTITRUST LITIGATION

THIS DOCUMENT RELATES TO:

ALL ACTIONS

Civil Action No. 05-340 (KAJ)

(consolidated)

IN RE TRICOR INDIRECT PURCHASER  
ANTITRUST LITIGATION

THIS DOCUMENT RELATES TO:

ALL ACTIONS

Civil Action No. 05-360 (KAJ)

(consolidated)

**STIPULATION AND ORDER**

The parties hereby agree, subject to order of the Court, that (1) the deadlines for Defendants to file papers in opposition to Motions for Class Certification filed by the Direct Purchaser Class Plaintiffs and the Indirect Purchaser Class Plaintiffs (collectively, "Plaintiffs"), respectively, are hereby extended through and including August 14, 2006; (2) the deadlines for Plaintiffs' respective reply papers are extended through and including September 29, 2006; (3) absent compelling circumstances, Defendants shall not seek additional extensions for the filing of their class certification opposition papers; and (4) Defendants shall produce their respective class certification experts on dates and at times mutually convenient to the parties, but at all events, during the period between September 6, 2006 and September 14, 2006, inclusive.

ROSENTHAL, MONHAIT & GODDESS, P.A.

*/s/ Jeffrey S. Goddess*

---

Jeffrey S. Goddess (#630)  
919 Market Street, Suite 1401  
P.O. Box 1070  
Wilmington, DE 19899-1070  
(302) 656-4433  
[jgoddess@rmgglaw.com](mailto:jgoddess@rmgglaw.com)  
*Liaison Counsel for Direct Purchasers*

MORRIS, NICHOLS, ARSHT & TUNNELL  
LLP

*/s/ James W. Parrett, Jr.*

---

Mary B. Graham (#2256)  
James W. Parrett, Jr. (#4292)  
1201 N. Market Street  
P.O. Box 1347  
Wilmington, DE 19899-1347  
(302) 658-9200  
[jparrett@mnat.com](mailto:jparrett@mnat.com)  
*Attorneys for Abbott Laboratories*

PRICKETT JONES & ELLIOTT, P.A.

*/s/ Elizabeth M. McGeever*

---

Elizabeth M. McGeever (#2057)  
1310 King Street, P.O. Box 1328  
Wilmington, DE 19899  
(302) 888-6500  
[emmcmgeeever@prickett.com](mailto:emmcmgeeever@prickett.com)  
*Attorneys for Walgreen Co., Eckerd Corp.,  
Kroger Co., Meijer Drug Inc., CVS  
Pharmacy Inc., Rite Aid Corp. and Rite Aid  
Headquarter Corp.*

CHIMICLES & TIKELLIS LLP

*/s/ A. Zachary Naylor*

---

Pamela S. Tikellis (#2172)  
A. Zachary Naylor (#4439)  
One Rodney Square, P.O. Box 1035  
Wilmington, DE 19899  
(302) 656-2500  
[pamelatikellis@chimicles.com](mailto:pamelatikellis@chimicles.com)  
[zacharynaylor@chimicles.com](mailto:zacharynaylor@chimicles.com)  
*Liaison Counsel for Indirect Purchasers*

RICHARDS, LAYTON & FINGER, P.A.

*/s/ Frederick L. Cottrell*

---

Frederick L. Cottrell, III (#2555)  
Anne Shea Gaza (#4093)  
One Rodney Square, P.O. Box 551  
Wilmington, DE 19899  
(302) 651-7700  
[Cottrell@rlf.com](mailto:Cottrell@rlf.com)  
[Gaza@rlf.com](mailto:Gaza@rlf.com)  
*Attorneys for Fournier Industrie Et Santé  
and Laboratoires Fournier, S.A.*

SO ORDERED this \_\_\_\_ day of June, 2006.

---

United States District Court Judge